

EXHIBIT 1

AFFIDAVIT OF LUCAS HALE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCT LIABILITY LITIGATION	MDL No. 2:18-mn-2873
	This Document relates to: <i>City of Camden, et al. v. BASF Corporation,</i> No. 2:24-cv-03174-RMG

EXHIBIT 1 TO CLASS MEMBER OBJECTION PURSUANT TO F.R.C.P. 23 (e)(5):
AFFIDAVIT OF LUCAS HALE

I, Lucas Hale, having been duly sworn, state the following, all of which is within my own personal knowledge:

1. I am over the age of eighteen.
2. I am currently employed by Widefield Water and Sanitation District ("Widefield") as District Manager.
3. Widefield is a quasi-municipal corporation and independent governmental entity organized and operating pursuant to Title 23 of the Colorado Revised Statutes.
4. Widefield operates an active municipal public water collection, treatment, and distribution system serving areas located in El Paso County, Colorado.
5. Widefield is an "Active Public Water System" as defined by the proposed Settlement Agreement ("Settlement") and by the Safe Drinking Water Act, administered by the U.S. Environmental Protection Agency ("EPA"), and the Colorado Department of Health and Environment ("CDPHE") for Public Water Systems located in the State of Colorado.
6. Widefield is registered (and was registered as of June 22, 2023) as an Active Public Water System with CDPHE under Public Water System ID CO0121900 with its status as "active."
7. Widefield's Active Public Water System serves a population of approximately 27,258 people.
8. Widefield's Active Public Water System is therefore considered a "large" system subject to the monitoring rules set forth in the EPA's fifth Unregulated Contaminant Monitoring Rule, published at 86 Fed. Reg. 73131 ("UCMR 5").
9. Widefield's has numerous water sources that supply water for Widefield's Active Public Water System, including both surface water and groundwater sources.

10. On or before June 22, 2023, at least 13 groundwater wells which supply Widefield Public Water System have tested positive for at least 11 out of the 29 PFAS compounds identified in UCMR 5. Therefore, Widefield has one or more Impacted Water Sources as defined by the Settlement.

11. Widefield is not excluded from the Settlement Class because Widefield is not owned and operated by a State government or by the federal government. Widefield has the independent authority to sue and be sued pursuant to C.R.S. § 32-1-1001(1)(c).

12. Widefield is not excluded from the Settlement Class because Widefield is not a privately owned well or surface water system, it is an Active Public Water System as described above.

13. For the reasons stated above, Widefield qualifies as a "Eligible Claimant" as defined in the Settlement qualifying as a member of the Settlement Class.

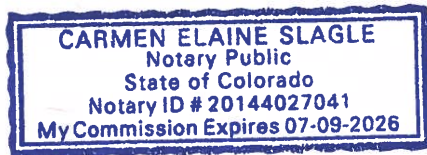
I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

Executed this 10 day of September, 2024


Lucas Hale

The above and foregoing Affidavit was subscribed and sworn to or affirmed before me this 10 day of September, 2024, by Lucas Hale.

SEAL




Notary Public